

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

JOSE MONTES OPICO,

Plaintiff,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:18-cv-01579-RSL

**JOINT STIPULATION TO EXTEND
THE BRIEFING SCHEDULE AND
CONTINUE NOTING DATE ON
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

Plaintiff Jose Montes Opico ("Plaintiff") and Defendant Convergent Outsourcing, Inc. ("Defendant"), through their counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiff filed a Motion for Partial Summary Judgment ("MSJ") on August 14, 2019 (Dkt. No. 25);

WHEREAS the MSJ is noted on this Court's Motion Calendar for September 6, 2019;

WHEREAS, Defendants' deadline for filing an Opposition to the MSJ is on September 3, 2019;

JOINT STIPULATION TO EXTEND THE
BRIEFING SCHEDULE ON PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT - 1
Case No. 2:18-cv-01579-RSL

Donald G. Grant, P.S.
Attorneys and Counselors at Law
Washougal Town Square, Ste 245
1700 Main Street
Washougal, WA 98671
TEL: (360) 694-8488
FAX: (360) 694-8688
E-MAIL: don@dongrantps.com

1 WHEREAS, Defendants' deadline for filing a Reply in support of the MSJ
2 is on September 6, 2019;

3 WHEREAS, the parties have scheduled a mediation to take place on
4 September 19, 2019 with Judge Linda Lau (Ret.) of Judicial Dispute Resolution in
5 Seattle;

6
7 WHEREAS, the parties mutually agree that postponing the briefing and any
8 hearing on the MSJ until after the mediation will enhance the chances of
9 settlement; and

10 WHEREFORE, it is hereby stipulated and agreed by the parties as follows:

- 11 1. The last day for Defendant to file its Opposition to the MSJ will be
12 September 30, 2019;
13
14 2. The last day for Plaintiff to file his Reply in support of the MSJ will be
15 October 4, 2019; and
16
17 3. The noting date for the MSJ will be October 4, 2019.

18 IT IS SO STIPULATED.
19
20
21
22
23
24
25
26
27
28

1 DATED: August 26, 2019

2
3 DONALD G. GRANT, P.S.

4 /s/ Donald G. Grant

5 DONALD G. GRANT, WSBA#15480
6 Of Counsel for Defendant Convergent
Outsourcing, Inc.

7 DONALD G. GRANT, P.S.
8 Attorneys and Counselors at Law
9 Washougal Town Square, Suite 245
10 1700 Main Street
Washougal, WA 98671
11 TEL: (360) 694-8488
12 CELL: (360) 907-3094
FAX: (360) 694-8688
E-MAIL: don@dongrantps.com

13 DATED: August 26, 2019

14 ANDERSON SANTIAGO, PLLC

15
16 /s/ Jason D. Anderson

17 JASON D. ANDERSON, WSBA#38014
Attorneys for Plaintiff Jose Montes Opico

18 ANDERSON SANTIAGO, PLLC
19 787 Maynard Ave. S
20 Seattle, WA 98104
21 TEL: (206) 395-2665
22 FAX: (206) 395-2719
E-MAIL: jason@alkc.net

23
24
25
26
27
28
JOINT STIPULATION TO EXTEND THE
BRIEFING SCHEDULE ON PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT - 3
Case No. 2:18-cv-01579-RSL

Donald G. Grant, P.S.
Attorneys and Counselors at Law
Washougal Town Square, Ste 245
1700 Main Street
Washougal, WA 98671
TEL: (360) 694-8488
FAX: (360) 694-8688
E-MAIL: don@dongrantps.com

~~PROPOSED~~ ORDER

Upon consideration of the stipulation submitted by the parties and good cause appearing therefor, the Court orders as follows:

1. The last day for Defendant to file its Opposition to Plaintiff's Motion for Summary Judgment ("MSJ") will be September 30, 2019;
2. The last day for Plaintiff to file his Reply in support of the MSJ will be October 4, 2019; and
3. The noting date for the MSJ will be October 4, 2019.

IT IS SO ORDERED.

DATED: September 5, 2019

Robert S. Lasnik
The Hon. Robert S. Lasnik